

**REMARKS**

Claims 1-7, 29-34, 41, 42, 44-48, 50-53 are pending. By this Amendment, claims 1, 29, 31, 41, 48 are amended, claims 8-28, 35-40, 43 and 49 are cancelled without prejudice or disclaimer and new claims 50-53 are added. In addition, the Abstract is also amended to shorten the text. Applicant respectfully request reconsideration in view of the above Amendments and following remarks.

Applicants note that claims 9-28 and 35-40 have been cancelled without prejudice or disclaimer responsive to the provisional election of species made during a telephone call with the Examiner on January 11, 2005.

Applicants appreciate the courtesies extended to Applicants' representatives during the February 10, 2005 personal interview. The topics discussed during the interview included a general discussion of the present invention, the references cited in the Office Action and the grounds for rejection.

**I. *Claim Objections***

The Office Action objects to claim 29, 31 and 48 based upon informalities. By this Amendment, claims 29, 31 and 48 are amended. Thus, withdrawal of the objections of claims 29, 31 and 48 is respectfully requested.

**II. *The Claims Meet the Requirements of 35 USC §112, Second Paragraph***

The Office Action ejects claims 31 and 48 under 35 USC §112, second paragraph for failing to particularly point out an distinctly claim the subject matter that the applicant regards as the Applicants regard as the invention. Claims 31 and 48 are amended. Thus, withdrawal of the rejection of claims 31 and 48 under 35 USC §112 is respectfully requested.

**III. *Claims 1-7, 29-34 and 41-49 Define Patentable  
Subject Matter Pursuant to 35 USC §103***

The Office Action rejects claim 1-7, 29-34, and 41-49 under 35 USC §103 (a) as being unpatentable over U.S. Published Application No. 20040088469A1 (the “Levy” reference) in view of U.S. Published Application No. 20040181617A1 (the “Sauber” reference). The rejection is respectfully traversed.

As described in greater detail below, the present invention provides a unique motherboard that accepts multiple high performance video cards and coordinates those multiple high performance video cards to provide improved video performance to a display device. As described in the specification of the present application, it is highly desirable to provide a motherboard having multiple high-speed video card slots that are capable of receiving high performance video cards that can then be operated concurrently. In this way, the present invention allows the leveraging of multiple standard, off-the-shelf video cards.

As described in the specification, prior to the present invention, multiple similar video cards could not be integrated on a motherboard to operate concurrently because the interconnect bandwidth was insufficient to realize the benefits from the multiple video cards. Moreover, the previously known interconnect technology had difficulties allocating data pathways between different video cards, thereby causing potential resource conflicts (e.g., two cards attempting to access the same memory location at the same time) and severely limiting the benefits from having multiple cards.

The Office Action rejects claim 1 over Levy in view of Sauber and asserts that Levy discloses a chipset for managing data transfers within a computing device, a scalable interconnect connecting the computing device and a plurality of ports or high speed video card slots connected to the interconnect. According to its abstract, Levy merely provides “flexibly

establishing lines of links” in an interconnect, and does not in anyway address the challenge of integrating multiple similar video cards on a single motherboard. Applicants strongly urge that the portion of the specification of Levy referenced in the Office Action, paragraph 16, merely provides an illustrative listing of components that may be connected to the interconnect includes “one or more devices, such as for example, Ethernet cards, video cards, RAID Controllers, SCSI controllers, ATA disk controllers, PCI bridges, etc coupled to a root device of the chipset,” and does not teach or suggest the concurrent use of multiple similar devices. For example, a computer generally would not contain multiple Ethernet cards because this multiple network card configuration may create potential internal conflicts. In fact, there is no discussion in Levy regard coordination of multiple similar video cards or other such similar components.

Sauber is directed to a system for using a switch to route peripheral and graphics data on an interconnect. Sauber describes a motherboard with a chipset for managing certain data transfers.

Thus, the combination of Levy and Sauber fails to provide the invention recited in independent claims 1, 41, and 48. For example, the combination of Levy and Sauber fails to provide a motherboard that enables a first and a second video card to attach, respectively, to the at least one first video card slot and second video card slot, and wherein the motherboard enables the first and the second video card to operate concurrently to output graphics data, as recited in claim 1. Independent claims 41 and 48 are similarly distinguishable from the applied references.

In addition, there is no motivation to combine and modify the teachings of Levy and Sauber to arrive at Applicants’ invention. Thus, it is respectfully submitted that Levy and Sauber cannot be properly combined and modified to arrive at the invention of independent claims 1, 41 and 48. Dependant claims 2-7, 29-34, 42 and 44-48 are likewise distinguishable for at the reasons described in connection with the independent claims above. Therefore, withdrawal of

the rejection of claims 1-7, 29-34, 41, 42 and 44-48 under 35 U.S.C. §103 is respectfully  
requested.

**CONCLUSION**

In view of the foregoing, Applicants respectfully request the reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution.

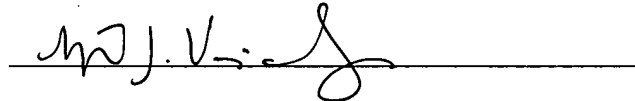
If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1349. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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Attachment:  
Replacement Abstract